

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

**RACHELLE GALLAGHER; and
MARK KACHADOURIAN,**

Plaintiffs,

3:18-CV-1476 (GTS/ML)

v.

**THE UNIFIED COURT SYSTEM OF
THE STATE OF NEW YORK; and
RICHARD MILLER,**

Defendants.

VERDICT FORM

I. PLAINTIFF GALLAGHER'S SECTION 1983 CLAIM

1. Did Plaintiff Gallagher prove, by a preponderance of the evidence, that Defendant Miller, while acting under the color of state law, violated her right to be free from a hostile work environment based on her gender under the Equal Protection Clause of the United States Constitution?

YES X NO

**II. PLAINTIFF GALLAGHER AND KACHADOURIAN'S' TITLE VII
CLAIMS**

2. Did Plaintiffs prove, by a preponderance of the evidence, that Defendant Unified Court System was their employer under the meaning of Title VII beginning in June 2017?

YES X NO

If you answered "NO" to Questions 1 and 2, then your verdict is complete: please date and sign this Verdict Form and notify the Marshal that you have reached a verdict. If you answered "YES" to only Question 1, proceed to Question 7. However, if you answered "YES" to Question 2, proceed to Question 3.

3. Did Plaintiff Gallagher prove, by a preponderance of the evidence, that Defendant Unified Court System subjected her to a hostile work environment in violation of Title VII?

YES NO X

4. Did Plaintiff Gallagher prove, by a preponderance of the evidence, that Defendant Unified Court System retaliated against her for engaging in protected activity in violation of Title VII?

YES NO X

5. Did Plaintiff Kachadourian prove, by a preponderance of the evidence, that Defendant Unified Court System subjected him to a hostile work environment in violation of Title VII?

YES NO X

6. Did Plaintiff Kachadourian prove, by a preponderance of the evidence, that Defendant Unified Court System retaliated against him for engaging in protected activity in violation of Title VII?

YES NO X

If you answered "NO" to Questions 1, 3, 4, 5, and 6, then your verdict is complete; please date and sign this Verdict Form and notify the Marshal that you have reached a verdict. Otherwise, proceed to Question 7.

III. DAMAGES

7. To the extent that you have answered "YES" to Question 1, state the amount of compensatory damages that Plaintiff Gallagher has proven, by a preponderance of the evidence, that she is entitled to recover from Defendant Miller:

\$ 200,000

8. To the extent you have answered "YES" to Questions 3 or 4, state the amount of compensatory damages that Plaintiff Gallagher has proven, by a preponderance of the evidence, that she is entitled to recover from Defendant Unified Court System:

\$ NA

To the extent that you answered either Question 7 or 8 with a finding of zero dollars, proceed to Question 9. Otherwise, proceed to Question 10.

9. To the extent that you find that Plaintiff Gallagher has failed to prove by a preponderance of the evidence that she is entitled to any compensatory damages from either Defendant, state an award of damages in some nominal or token amount not to exceed the sum of one dollar (\$1.00) against that Defendant (You may only award nominal damages to a Defendant to whom you found no amount of compensatory damages was proven):

Defendant Miller

\$ NA

Defendant Unified Court System \$ NA

10. To the extent you have answered "YES" to Questions 5 or 6, state the amount of compensatory damages that Plaintiff Kachadourian has proven, by a preponderance of the evidence, that he is entitled to recover from Defendant Unified Court System:

\$ NA

To the extent that you answered Question 10 with a finding of zero dollars, proceed to Question 11. Otherwise, proceed to Question 12.

11. To the extent that you find that Plaintiff Kachadourian has failed to prove by a preponderance of the evidence that he is entitled to any compensatory damages from Defendant Unified Court System, state an award of damages in some nominal or token amount not to exceed the sum of one dollar (\$1.00) against Defendant Unified Court System:

\$ 1.00

12. To the extent that you have answered "YES" with regard to Question 1, do you find that Defendant Miller acted maliciously or wantonly with regard to Plaintiff Gallagher's rights, such that punitive damages should be assessed against Defendant Miller?

YES X NO

**FOREPERSON, PLEASE DATE AND SIGN
THE VERDICT FORM BELOW, AND NOTIFY THE**

MARSHAL THAT YOU HAVE REACHED A VERDICT.

Dated: July 31, 2025



Jury Foreperson

*Name Redacted